

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)

IN RE:

CHRISTIE LEIGH MORRIS,

Debtor.

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Case No. 19-21714 TJC

(Chapter 13)

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**MID-ATLANTIC UTILITIES, LLC'S OBJECTION TO CONFIRMATION OF THE DEBTOR'S
CHAPTER 13 PLAN**

Mid-Atlantic Utilities, LLC ("Mid-Atlantic"), a secured creditor in the above-captioned case, by its undersigned counsel, hereby files, pursuant to 11 U.S.C. § 1325, Rule 3015(f) of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 3015-2, this Objection to Confirmation of the Debtor's Chapter 13 Plan, and in support thereof states:

1. On or about August 31, 2019 (the "Petition Date"), Debtor, Christie Leigh Morris (the "Debtor"), filed a voluntary petition under Chapter 13 of Title 11 of the United States Bankruptcy Code.

2. On or about October 7, 2019, the Debtor filed a Chapter 13 Plan (the "Plan"). See Docket Entry No. 17.

3. Prior to the filing of this objection to the Plan, Mid-Atlantic filed a Proof of Claim in the instant case (the "Proof of Claim"). See Claim No. 31-1, which is incorporated herein by reference as if fully set forth herein. The total arrearage due and owing to Mid-Atlantic as of the Petition Date is Nine Hundred Nine and 66/100 Dollars (\$909.66) (the "Claim").

4. Mid-Atlantic's Claim arises under a Utility Declaration as that term is defined in the Claim. The claim is secured in, to and against the Debtor's real property pursuant to a Statement of Lien as that term is defined in the Claim. A true and accurate copy of the Utility Declaration and the Statement of Lien are attached to the Claim and incorporated herein by reference.

5. Paragraph 1 of the Utility Declaration provides that unpaid utility assessments shall accrue interest at the rate of six percent (6%) per annum.

6. The Plan, as submitted, fails to provide that the secured pre-petition past-due principal portion of the Claim be paid at the designated rate in the Utility Declaration.

WHEREFORE, Mid-Atlantic Utilities, LLC respectfully requests this Honorable Court to enter an order denying confirmation of the Debtor's Chapter 13 Plan and grant such further and additional relief as is necessary and proper.

Respectfully submitted,

/s/ Chad M. Shue

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Counsel for Mid-Atlantic Utilities, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 19th day of November, 2019, copies of the foregoing Objection to Confirmation of the Debtor's Chapter 13 Plan and proposed Order were sent via first-class mail, postage prepaid, and via the Court's electronic filing system to:

Robert John Harris
Robert J. Harris, P.L.C.
P.O. Box 1551
Woodbridge, Virginia 22195
Attorney for Debtor

Timothy P. Branigan
9891 Broken Land Parkway, Suite 301
Columbia, Maryland 21046
Chapter 13 Trustee

Office of the United States Trustee
6305 Ivy Lane, Suite 600
Greenbelt, Maryland 20771

And via first-class mail, postage prepaid only to:

Christie Morris
13746 Palmetto Circle
Germantown, Maryland 20874
Chapter 13 Debtor

/s/ Chad M. Shue
CHAD M. SHUE